



Report of Services Rendered

June 20, 2024

I, Jim Stafford, am a certified, court-qualified expert in Video Forensics, Image Analysis, Audio Forensics, Digital Forensics, and Mobile Device Forensics. I performed such work on 58 cases so far in 2024. I attend advanced training sessions in these disciplines as well as participate in peer forums.

Case: *Jane Doe v. Academir Charter Schools, Inc., and Superior Charter School Services, Inc.*

Purpose

The purpose of this investigation was to examine documents produced by Academir Charter Schools Inc. and Superior Charter School Services Inc. during litigation to determine whether: (1) any discrepancies exist that may indicate potential fabrication or misrepresentation of evidence, and (2) any of the electronic files contain metadata to support a creation date prior to May 9, 2024.

Items Relied Upon

- (1) TITLE IX POLICIES AND PROCEDURES.pdf
- (2) 2023-2024 Title IX Manual.pdf
- (3) TITLE IX POLICIES AND PROCEDURES (1).docx
- (4) Original Electronic Manual File Metadata Creation and Modification.pdf
- (5) TITLE IX POLICIES AND PROCEDURES.docx

- (6) Document Properties.docx
- (7) TITLE IX Policies metadata.jpg

Tools Utilized

- File Viewer Plus 4
- Adobe Acrobat PDF Reader
- Microsoft Word

Process and Examination Steps

I began by viewing each of the PDF files using Adobe Acrobat, the .docx files in Microsoft Word, and the .jpg file and .eml files in File Viewer Plus. My observations were as follows:

1. I observed that TITLE IX POLICIES AND PROCEDURES.pdf and 2023-2024 Title IX Manual.pdf appeared to be the same except that the metadata showed different creation dates.
2. TITLE IX POLICIES AND PROCEDURES.pdf was created on May 10, 2024, at 10:38 PM while 2023-2024 Title IX Manual.pdf was created May 15, 2024, at 12:29 PM.
3. TITLE IX POLICIES AND PROCEDURES (1).docx shows a creation date of June 12, 2024. Its metadata shows that it is 13 pages long, with 190 lines, 53 paragraphs, a word count of 4,012, a character count of 22,873, and a size of 352 kB.
4. Original Electronic Manual File Metadata Creation and Modification.pdf shows a creation date of May 15, 2024, at 12:02 PM. The document contains metadata screenshots indicating a file titled TITLE IX POLICIES AND PROCEDURES was created on August 10, 2022, at 6:11 PM. It also shows that it was modified on May 9, 2024, at 6:47 PM. The total editing time was five hours, and it was last saved by

Olivia Bernal. Three other files in this investigation bear the same name but differ in content.

5. TITLE IX POLICIES AND PROCEDURES.docx was created on June 12, 2024, at 4:14 PM. Its metadata shows that it is 10 pages long, with 142 lines, 40 paragraphs, a word count of 2995, a character count of 17077, and a size of 345 kB.
6. Document Properties.docx shows a creation date of June 12, 2024, at 4:16 PM. The document contains a collection of three metadata screenshots, also referring to a file titled TITLE IX POLICIES AND PROCEDURES. The images also refer to a file created on August 11, 2022, at 6:11 PM and appear to be the same image shown on the second page of Original Electronic Manual File Metadata Creation and Modification.pdf. This metadata shows a file that is 10 pages long, with 149 lines, 42 paragraphs, a word count of 3150, a character count of 17957, and a size of 381 kB.
7. TITLE IX Policies metadata.jpg is an image likely taken with a phone camera. It shows a list of policy files generated with the search criteria of: “Policies and Procedures” within the “E” drive of this HP computer. The modified dates of these files range between 2021 and 2024. One file is highlighted: TITLE IX POLICIES AND PROCEDURES. The General pane in Properties refers to a file created on August 10, 2022, at 6:11 PM, that is 381 KB in size. It was modified on May 15, 2024, at 2:40 PM. This image shows other electronic files also titled TITLE IX POLICIES AND PROCEDURES. The visible electronic files show modified dates of May 10, 2024.

Discussion

This investigation would not have been necessary if a TITLE IX POLICIES AND PROCEDURES file had been presented demonstrating metadata supporting a creation date prior to May 9, 2024. None of the files I

examined do. The screenshot images of file property details do not match any of the files I examined either. I believe the TITLE IX Policies metadata.jpg file and the Document Properties.docx were intended to represent the TITLE IX POLICIES AND PROCEDURES.docx and TITLE IX POLICIES AND PROCEDURES (1).docx files. However, other than the page count of TITLE IX POLICIES AND PROCEDURES.docx, all the matrices differ.

Comparison 1: TITLE IX POLICIES AND PROCEDURES.docx vs. Document Properties.docx

Attribute	TITLE IX POLICIES AND PROCEDURES.docx	Document Properties.docx	Discrepancy
Pages	10	10	None
Words	2,995	3,150	+186
Characters	17,707	17,957	+250
Paragraphs	40	42	+2
Lines	142	149	+7
File Size (kB)	345	381	+36

Comparison 2: TITLE IX POLICIES AND PROCEDURES (1).docx vs. Document Properties.docx

Attribute	TITLE IX POLICIES AND PROCEDURES (1).docx	Document Properties.docx	Discrepancy
Pages	13	10	-3
Words	4,012	3,150	-862
Characters	22,873	17,957	-4,916
Paragraphs	53	42	-11
Lines	190	149	-41
File Size (kB)	352	381	+29

Conclusion

In conclusion, based on my education, training, experience, and expertise in Digital Forensics, it is my expert opinion that the images of the file property details contained in Document Properties.docx do not match any of the files I examined and that none of the electronic files I examined can support a creation date prior to May 9, 2024.

A handwritten signature in black ink that reads "Jim Stafford". The signature is fluid and cursive, with "Jim" on the first line and "Stafford" on the second line.

Jim Stafford, Forensic Examiner

Eclipse Forensics